

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
NEWARK VICINAGE**

In re

Clyde S. Green

Chapter 13 Debtor

Case No. 24-22320

Chapter 13

Hon. John K. Sherwood

OBJECTION TO CONFIRMATION

SCOTT J. GOLDSTEIN, ESQ. on behalf of Law Offices of Wenarsky & Goldstein, LLC (“Creditor”), a creditor in this case hereby objects to the confirmation of the Plan filed by the Debtor as follows:

1. The Debtor, Clyde S. Green (“Debtor”) filed a voluntary petition under Chapter 13 of the United States Bankruptcy Code on December 16, 2024.
2. The Debtor, on January 8, 2025, filed a Plan in the within case.
3. The Debtor’s filed plan does not address the Creditors’s claim at all, though the claim should be listed in Part 3 of the current Plan Form.
4. Creditor holds a claim filed at claim no. 1 in this matter in the amount of \$3133.00. This claim is for attorneys fees in the debtor’s prior Chapter 13 case as awarded by Order of this Court dated October 8, 2024. The said claim is entitled to priority under 11 U.S.C. §507(a)(2) as an allowed administrative claim in the prior case pursuant to 11 U.S.C. §§327, 330 and 503(b).
5. The Plan, as filed, does not comply with 11 U.S.C. §1322(a)(2) in that it does not provide for payment of all claims entitled to priority under 11 U.S.C. §507. As such, the Plan does not comply with 11 U.S.C. §1325(a)(1) insofar as it does not comply with all provisions of Chapter 13.
6. The Creditor objects to the confirmation of any plan that pays the Creditor less than \$3133.00 as set forth in Claim 1.

WHEREFORE, Creditor respectfully prays that this court sustain the objection set forth herein and deny the

Debtor's Plan and for such other and further relief as the Court deems just and appropriate.

Dated: January 8, 2025

LAW OFFICES OF
WENARSKY & GOLDSTEIN, LLC

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